

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**IN RE:**

National Filters Inc.

Case No. 21-21149-dob

Debtor(s).

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Hon. Daniel S. Opperman, Bay City  
Chapter 11, Subchapter V

**SUBCHAPTER V TRUSTEE'S  
APPLICATION FOR ORDER APPROVING FEES**

Kimberly Ross Clayson Subchapter V Trustee (“Applicant”) for National Filters, Inc. (“Debtor”), respectfully submits the following as her first application for compensation:

**Procedural Background**

On October 26, 2021 Debtor’s principal caused the filing of the Debtor’s voluntary petition under Chapter 11 and elected to proceed pursuant to Subchapter V. On October 27, 2021 Applicant was appointed as Subchapter V Trustee for Debtor. Applicant has performed duties as Subchapter V Trustee from October 27, 2021 through June 6, 2022. The services rendered by Applicant have supported Debtor’s reorganization efforts and reimbursement of fees and costs is appropriate and necessary at this time.

As provided at the Notice of Appointment at Docket No. 5 in this case, Applicant requests fees pursuant to 11 U.S.C. §§330 and 331 and L.B.R. 2016-1 (ED

Mich.). In accordance with L.B.R. 2016-1(a) (ED Michi) and Fed. R. Bankr. P. 2016(a), Applicant has not received payments nor have any payments been promised to Applicant for services rendered or to be rendered in connection with this case. Applicant will be paid with funds on hand with Debtor and Applicant has not received prior compensation and has no agreement with any other entity to share in Applicant's compensation. However, Applicant's fees are to be paid \$1,650 to Applicant's former law firm, Red House Law, PLLC and \$5,313 to Applicant's current law firm, Jaffe Raitt Heuer & Weiss, PLLC.

1. **Fees requested in present application:**

- A. Applicant requests fees in the amount of \$7,128.
- B. Applicant requests expense reimbursement in the amount of \$0.
- C. No retainer has been paid to Applicant.

2. **Period in Which Services were Performed:** Services were rendered for the period of October 27, 2021 through June 8, 2022.

3. **Summary of Services:**

Applicant was appointed as Subchapter V Trustee on October 27, 2020 and immediately contacted Debtor to obtain information about the Debtor's financial affairs and business operations, reason for the petition filing, issues anticipated to achieve confirmation and the Debtor's goals in the Chapter 11 case in pursuit of a successful confirmation of a Chapter 11 Subchapter V Plan of Reorganization.

Applicant reviewed Debtor's schedules, statement of financial affairs, tax returns and financial records.

Applicant attended Debtor's Chapter 11 initial debtor interview and 341 creditor meeting and Debtors' status conference.

Applicant reviewed and monitored Debtor's monthly operating reports on file with the court to evaluate the Debtors' prospects for reorganization.

Applicant reviewed draft versions of Debtor's plan of reorganization and provided Debtor with recommended revisions to assist the Debtor's ability to promote a confirmable consensual plan.

Applicant reviewed Debtor's filed Plan together with supporting exhibits and made recommendations to Debtor for providing additional details in an acceptable order confirming plan.

Applicant attended Debtor's confirmation hearing and supported confirmation of the Debtor's plan.

4. **Adversary proceedings:** No adversary proceedings were filed in this matter.
5. The status of the bankruptcy matter is that the Debtor's plan was timely filed and the Debtor's plan has been confirmed.
  - a. Cash on hand as of the Debtors May Monthly Operating Report:  
\$216,361.10.
  - b. Unpaid administrative expenses: \$7,128 requested in this fee

application for the Subchapter V Trustee and \$85,000 in fees and \$2,000 in expenses for Debtor's counsel.

- c. Interim distribution: None
  - d. Operating profit or loss: Debtor's operating profit through month-end April 30, 2022 was \$303,264.18.
  - e. All monthly operating reports due through the date of this fee application have been filed.
6. **Nature of services to be provided in the future:** The Debtor's plan is confirmed and other than filing a final report Applicant anticipates it will not perform any further services.
7. **Duplication of Services:** Applicant performed all services without the assistance of any other professionals or staff.
8. **Fees and costs previously approved to Applicant:** None.
9. The Applicant provided a copy of this application to the Debtor and Debtor did not raise any objections pertaining to fees.
10. A copy of a Proposed Order is attached as **Exhibit 1**.
11. A copy of the notice of appointment of Applicant is attached as **Exhibit 2**.
12. A summary statement of the number of hours of services rendered by Applicant is attached as **Exhibit 4**.
13. An itemized time record is attached as **Exhibit 5**.

14. A brief biographical statement is attached as **Exhibit 6**.
15. An itemized statement of expenses for which reimbursement is sought is attached as **Exhibit 7**.

Wherefore Applicant requests that this Honorable Court enter an order approving fees for Subchapter V Trustee in the amount of \$7,128 and no expense reimbursement.

Respectfully submitted,

SUBCHAPTER V. TRUSTEE

Dated: June 8, 2022

By: /s/ Kimberly Ross Clayson  
Kimberly Ross Clayson (P69804)  
JAFFE, RAITT, HEUER & WEISS, P.C.  
27777 Franklin Road – Suite 2500  
Southfield, MI 48034  
P: 248.351.3000  
[kclayson@jaffelaw.com](mailto:kclayson@jaffelaw.com)

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**IN RE:**

National Filters Inc.

Case No. 21-21149-dob

Debtor(s).

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Hon. Daniel S. Opperman, Bay City  
Chapter 11, Subchapter V

**EXHIBIT LIST**

<u>Ex. No.</u>	<u>Description</u>
1.	Proposed Order
2.	US Trustee filed Notice of Appointment
3.	N/A
4.	Summary of Applicant's Fees
5.	Itemized Time Record
6.	Biography
7.	Itemized Statement of Expenses

**EXHIBIT 1**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**IN RE:**

National Filters Inc.

Case No. 21-21149-dob

Debtor(s).

Hon. Daniel S. Opperman, Bay City  
Chapter 11, Subchapter V

**ORDER APPROVING APPLICATION FOR  
COMPENSATION FOR DEBTOR'S COUNSEL**

This matter having come before the Court upon the application of Kimberly Ross Clayson, Chapter 11 Subchapter V Trustee, all interested parties having been served with notice of the application and the provisions of E.D. Mich. LBR 2016-1 having been met, no objections to the application having been received and a certification of no response having been filed, and the Court being otherwise fully advised in the premises;

**IT IS HEREBY ORDERED:**

1. The Court grants Applicant's current fee application as follows:

This award for fees:       \$ 7,128.00

This award of costs:       \$ 0.00

TOTAL THIS AWARD       \$ 7,128.00

2. This award covers services rendered and expenses incurred during the time period of October 27, 2021 through June 6, 2022.
3. Debtor shall pay Applicant's fees of \$7,128 as follows: \$1,650 due and payable to Red House Law, PLLC and \$5,478 due and payable to Jaffe Raitt Heuer & Weiss, PC.

## EXHIBIT 2

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re:

Case No. 21-21149-dob

**National Filters Inc.,**

Chapter 11

Debtor.

Hon. Daniel S. Opperman

**NOTICE OF APPOINTMENT OF SUBCHAPTER V TRUSTEE**

Pursuant to 11 U.S.C. § 1183(a), the United States Trustee has appointed the following qualified individual as Subchapter V trustee in the above-captioned case:

Kimberly Ross Clayson  
Principal Attorney  
Red House Law  
1420 Washington Blvd., 301  
Detroit, MI 48226  
(313) 306-7745  
Email: kim@redhouselaw.com

The trustee's verified statement of disinterestedness and anticipated rate of compensation is attached to this notice.



Respectfully submitted,

**ANDREW R. VARA**  
**UNITED STATES TRUSTEE**  
Regions 3 and 9

By: /s/ Jill M. Gies (P56345)  
Trial Attorney  
Office of the U.S. Trustee  
211 West Fort St - Suite 700  
Detroit, Michigan 48226  
(313) 226-7913  
Jill.Gies@usdoj.gov

Date: October 26, 2021

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re:

Case No. 21-21149-dob

**National Filters Inc.,**

Chapter 11

Debtor.

Hon. Daniel S. Opperman

**VERIFIED STATEMENT OF SUBCHAPTER V TRUSTEE**

In connection with the United States Trustee's Notice of Appointment of Kimberly Ross Clayson as Subchapter V trustee in this proceeding, I hereby verify that I am a "disinterested person" as defined by 11 U.S.C. §101(14) in that I:

- (a) am not a creditor, equity security holder or insider of the debtor;
- (b) am not, and was not, within two years before the date of filing of the petition, a director, officer, or employee of the debtor; and
- (c) do not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the debtor, or for any other reason.

Subject to court approval pursuant to 11 U.S.C. § 330, I anticipate seeking compensation for my service in this case at an hourly rate of **\$300.00**, in addition to seeking reimbursement for any actual and necessary expenses I incur.

I hereby accept my appointment as subchapter V trustee in this case pursuant to FRBP 2008.

Respectfully submitted,

By: *Kimberly Ross Clayson*  
/s/Kimberly Ross Clayson  
Principal Attorney  
Red House Law  
1420 Washington Blvd., 301  
Detroit, MI 48226  
(313) 306-7745  
Email: kim@redhousetlaw.com

Date: October 26, 2021

**EXHIBIT 4**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**IN RE:**

National Filters Inc.

Case No. 21-21149-dob

Debtor(s).

Hon. Daniel S. Opperman, Bay City  
Chapter 11, Subchapter V

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**SUMMARY OF SUBCHAPTER V TRUSTEE FEES**

Trustee:

21.3 hours x \$300 - \$330/hour .....\$7,128

# EXHIBIT 5

## Red House Law PLC

1420 Washington Blvd Ste 301  
MI 48226 US  
+1 3133067745  
kim@redhouselaw.com

## INVOICE

BILL TO  
National Filters

INVOICE 1054  
DATE 06/06/2022  
TERMS Due on receipt  
DUE DATE 06/06/2022

DATE		DESCRIPTION	QTY	RATE	AMOUNT
10/27/2021	Case Administration	Review of case filing, missing documents and verified statement for appointment	0:24	300.00	120.00
11/09/2021	Case Administration	Call with Debtor's counsel to get overview of Debtor's plan and discuss initial first day motion issues to resolve	0:24	300.00	120.00
11/10/2021	Cash Collateral Post Petition Financing	Review of interim order for cash collateral, review of UST notes on revisions and email response to Debtor's counsel outlining current information needs	0:24	300.00	120.00
11/15/2021	Case Administration	Attendance at IDI	0:24	300.00	120.00
11/15/2021	Case Administration	Review of schedules, statement of operation and other docs	0:36	300.00	180.00
11/15/2021	Asset Analysis & Recovery	Call with Ira Perlmuter re possible equity buy in Debtor entity, follow up call with Debtor's counsel about the same	0:12	300.00	60.00
11/18/2021	Cash Collateral Post Petition Financing	Review of "revised" cash collateral order, notes regarding missing info, call with UST about the same, email follow up to Debtor's counsel on missing details	0:48	300.00	240.00
11/22/2021	Case Administration	Call with Debtor's counsel about status of case and progress on CCO	0:18	300.00	90.00
11/23/2021	Cash Collateral Post Petition Financing	Review of current draft of CCO and notes back to Debtor about remaining issues	0:30	300.00	150.00
11/23/2021	Cash Collateral Post Petition Financing	Review of COO and email notes to debtor's counsel on outstanding issues	1:12	300.00	360.00
12/06/2021	Subchapter V Plan	Response to Debtor's counsel with info re plan drafting	0:18	300.00	90.00

BALANCE DUE

**\$1,650.00**



27777 FRANKLIN ROAD, SUITE 2500 • P.O. BOX 5034 • SOUTHFIELD, MICHIGAN 48086-5034  
PHONE 248.351.3000 • FAX 248.351.3082  
www.jaffelaw.com

Kimberly Ross Clayson as Subchapter V Trustee June 7, 2022  
c/o Jaffe Raitt Heuer & Weiss  
27777 Franklin Rd., Suite 2500  
Southfield, MI 48034

Invoice No. 497359

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RE: NATIONAL FILTERS - BANKRUPTCY

FOR SERVICES RENDERED THROUGH 06/07/22  
AS ITEMIZED ON THE ATTACHED REPORT

TOTAL ATTORNEY FEES: \$ 5,478.00

TOTAL AMOUNT DUE: \$ 5,478.00

FED. TAX I.D. 38-1915036

TERMS: NET 30 DAYS

{TA}

DATE	ATTY	TASK/ ACT. CODE	TASK CODE DESCRIPTION ACTIVITY CODE DESCRIPTION SERVICE DESCRIPTION	HOURS	
02/08/22	KRC	B185	ASSUMPTION/REJECTION OF LEASES AND EMAIL TO COUNSEL FOR DEBTOR ABOUT MOTION TO ASSUME.	0.10	33.00
02/08/22	KRC	B110	CASE ADMINISTRATION RECEIVED/REVIEWED STIPULATION RESOLVING MOTION TO ASSUME LEASE.	0.10	33.00
02/08/22	KRC	B110	CASE ADMINISTRATION EMAIL G. JACOBS CONFIRMING HEARING RESOLVED.	0.10	33.00
02/08/22	KRC	B110	CASE ADMINISTRATION RECEIVED AND REVIEWED OBJECTION TO PLAN DEADLINE EXTENSION MOTION.	0.10	33.00
02/09/22	KRC	B110	CASE ADMINISTRATION REVIEWED STIPULATION RESOLVING MOTION TO EXTEND PLAN DEADLINES AND PROPOSED DEADLINES.	0.20	66.00
02/15/22	KRC	B110	CASE ADMINISTRATION REVIEW OF ORDER EXTENDING DEADLINES AND EMAIL FROM UST ABOUT MISSED PLAN DEADLINE.	0.20	66.00
02/15/22	KRC	B110	CASE ADMINISTRATION CHECK IN WITH DEBTOR'S COUNSEL ON PLAN STATUS.	0.10	33.00
02/18/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL READ AND REVIEWED TERMS OF PLAN.	1.40	462.00
02/18/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL EMAIL NOTES TO DEBTOR'S COUNSEL ABOUT ISSUES IN PLAN INCLUDING REVIEW OF TAX RETURNS AND FINANCIAL PROJECTIONS.	1.20	396.00
02/22/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL CALL WITH CREDITOR COUNSEL E. CROWDER TO DISCUSS ISSUES IN PLAN.	0.50	165.00



02/23/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL CALL WITH DEBTOR'S COUNSEL TO DISCUSS STATUS OF RESOLVING DOCUMENT REQUESTS AND PLAN REVISIONS NEEDED.	0.30	99.00
02/23/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL RECEIVED AND REVIEWED EMAIL FROM DEBTOR'S COUNSEL ADDRESSING ISSUES RAISED ON PLAN DETAILS.	0.10	33.00
02/24/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL RECEIVED EMAIL FROM CREDITOR COUNSEL CONFIRMING CONVERSATION WITH DEBTOR COUNSEL ABOUT NEW PLAN.	0.10	33.00
02/24/22	KRC	B110	CASE ADMINISTRATION RECEIVED AND REVIEWED ORDER REVISING DEADLINES.	0.10	33.00
02/28/22	KRC	B110	CASE ADMINISTRATION UPDATES FOR MONTHLY TRUSTEE REPORT.	0.10	33.00
03/03/22	KRC	B110	CASE ADMINISTRATION RECEIVED/REVIEWED PROOF OF CLAIM AND STAY RELIEF MOTION.	0.20	66.00
03/08/22	KRC	B110	CASE ADMINISTRATION RECEIVED AND REVIEWED FIRST AMENDED PLAN, EMAIL NOTES BACK TO DEBTOR'S COUNSEL ABOUT REMAINING ISSUES IDENTIFIED IN PLAN TO BE RESOLVED TO ESTABLISH FEASIBILITY, BEST INTERESTS AND BEST EFFORTS.	1.20	396.00
03/09/22	KRC	B110	CASE ADMINISTRATION READ AND REVIEWED PLAN OF REORGANIZATION AND PLAN PROJECTIONS.	1.00	330.00
03/14/22	KRC	B110	CASE ADMINISTRATION READ AND REVIEWED CPA LETTER ABOUT "SHAREHOLDER LOAN RECEIVABLE," TODD RAINES PERSONAL FINANCIAL STATEMENT AND EMAIL REQUESTING FURTHER INFORMATION TO SUPPORT THE CPA LETTER AND THE PFS.	0.40	132.00
03/15/22	KRC	B110	CASE ADMINISTRATION RECEIVED AND READ CRITICAL VENDOR MOTION.	0.60	198.00

03/15/22	KRC	B110	CASE ADMINISTRATION RECEIVED AND READ OBJECTION TO LYDALL CLAIM.	0.20	66.00
03/24/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL RECEIVED AND READ CREDITOR COUNSEL EMAIL REQUESTING INFORMATION IN SUPPORT OF THE PLAN.	0.10	33.00
03/24/22	KRC	B110	CASE ADMINISTRATION REVIEW OF SCHEDULING ORDER.	0.10	33.00
03/28/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL REVIEW OF PROPOSED OCP AND NOTES TO G. JACOBS ON QUESTIONS AND SUGGESTIONS.	0.50	165.00
03/28/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL REVIEW OF EMAILS FROM UNSECURED CREDITOR INQUIRING ABOUT FINANCIAL AFFAIRS OF THE DEBTOR.	0.50	165.00
03/28/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL EMAILS WITH UST ABOUT ASCO AS CRITICAL VENDOR AND PLAN TREATMENT.	0.20	66.00
03/30/22	KRC	B110	CASE ADMINISTRATION REVIEW OF FILE, DOCKET AND MORS AND UPDATE TO MONTHLY TRUSTEE REPORT.	0.30	99.00
03/31/22	KRC	B310	CLAIMS ADMINISTRATION AND OBJECTION CALL WITH DEBTOR'S COUNSEL TO DISCUSS PROSPECTIVE SETTLEMENT OF CLAIMS OBJECTION RELATED TO LYDELL.	0.20	66.00
03/31/22	KRC	B310	CLAIMS ADMINISTRATION AND OBJECTION CALL WITH CREDITOR'S COUNSEL E. CROWDER TO ANSWER QUESTIONS ABOUT CLAIMS ISSUES.	0.10	33.00
04/04/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL RECEIVED AND REVIEWED DRAFT OCP FROM DEBTOR'S COUNSEL AND DRAFT MOTION TO APPROVE COMPROMISE BY DEBTOR'S COUNSEL RE LYDELL CLAIM FOR REMARKS AND EMAIL RESPONSE TO DEBTOR'S COUNSEL REGARDING THE SAME.	0.30	99.00

04/05/22	KRC	B110	CASE ADMINISTRATION RECEIVED AND READ AMENDMENTS TO SCHEDULES.	0.10	33.00
04/05/22	KRC	B110	CASE ADMINISTRATION CALL WITH JUDGE'S CLERK ABOUT STATUS OF CASE FOR CONFIRMATION AND PROCEDURES FOR CONFIRMATION HEARING.	0.10	33.00
04/07/22	KRC	B110	CASE ADMINISTRATION READ EMAILS FROM DEBTOR'S COUNSEL ON STATUS OF CONFIRMATION AND RESOLUTION OF CLAIMS OBJECTIONS.	0.40	132.00
04/07/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL CALL WITH DEBTOR'S COUNSEL TO VERIFY ESTIMATED SUBSTANTIAL CONSUMMATION DATE DISCUSSED IN THE OCP.	0.20	66.00
04/07/22	KRC	B110	CASE ADMINISTRATION UPDATED COURT ON STATUS OF SETTLEMENT.	0.10	33.00
04/07/22	KRC	B110	CASE ADMINISTRATION EMAIL RESPONSE TO DEBTOR'S COUNSEL ABOUT CONCERNS ON SUBMISSION OF CREDITOR'S CONDITIONAL BALLOT.	0.20	66.00
04/12/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL CALL WITH G. JACOBS TO DISCUSS PLAN AND BALLOTING QUESTIONS AND CONFIRMATION ISSUES.	0.30	99.00
04/13/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL READ DEBTOR'S BALLOT SUMMARY REPORT, EMAIL REMARKS RE ADDITIONAL INFORMATION NEEDED ON VOTING CREDITORS.	0.40	132.00
04/13/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL LOOKED AT APPLICABLE LAW FOR UCC-1 FILINGS.	0.30	99.00
04/13/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL APPEARANCE AT STATUS CONFERENCE HEARING.	0.80	264.00

04/14/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL CALL WITH DEBTOR'S COUNSEL ABOUT VOTE TABULATION AND CHANGE OF BALLOT VOTE.	0.10	33.00
04/19/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL APPEARANCE AT CONFIRMATION HEARING.	0.40	132.00
04/21/22	KRC	B320	PLAN AND DISCLOSURE STATEMENT (INCL ATTENTION TO DEBTOR COUNSEL'S QUESTION ON PRESENTMENT OF OCP.	0.20	66.00
04/25/22	KRC	B160	FEE/EMPLOYMENT APPLICATIONS REVIEWED ACCOUNTING BILL AND NOTES TO DEBTOR'S COUNSEL TO RESPOND TO QUESTIONS ON THE SAME.	0.30	99.00
04/29/22	KRC	B110	CASE ADMINISTRATION REVIEW OF CASE FOR MONTHLY REPORT.	0.10	33.00
06/06/22	KRC	B160	FEE/EMPLOYMENT APPLICATIONS DRAFT AND PREPARATION OF FEE APPLICATION.	1.20	396.00
06/06/22	KRC	B110	CASE ADMINISTRATION REVIEW OF DOCKET AND DOCUMENTS, PREPARATION OF FINAL REPORT.	0.80	264.00

\*-----ATTORNEY SUMMARY BY TASK CODE-----\*

*-CODE-*	*-----TIMEKEEPER-----*	HOURS	FEES
B110			
	KIMBERLY ROSS CLAYSON	6.80	2,244.00
	Total Task Code: B110	6.80	2,244.00
B160			
	KIMBERLY ROSS CLAYSON	1.50	495.00
	Total Task Code: B160	1.50	495.00
B185			
	KIMBERLY ROSS CLAYSON	.10	33.00
	Total Task Code: B185	.10	33.00
B310			
	KIMBERLY ROSS CLAYSON	.30	99.00
	Total Task Code: B310	.30	99.00
B320			
	KIMBERLY ROSS CLAYSON	7.90	2,607.00

KIMBERLY ROSS CLAYSON AS SUBCHAPTER V TRUSTEE  
FILE NUMBER: KRCTTE-NATFIL  
INVOICE NO.: 497359

Jun 7, 2022

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Total Task Code: B320	7.90	2,607.00
TOTALS	16.60	5,478.00

*-----TIME AND FEE SUMMARY-----*						
*-----TIMEKEEPER-----*	RATE	HOURS	%	FEE	%	
K CLAYSON	NON-EQUITY MEM.	330.00	16.60	100.0	5478.00	100.0
TOTALS			16.60		5478.00	

## EXHIBIT 6

### UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

**IN RE:**

National Filters Inc.

Case No. 21-21149-dob

Debtor(s).

---

Hon. Daniel S. Opperman, Bay City  
Chapter 11, Subchapter V

### CHAPTER 11 SUBCHAPTER V TRUSTEE BIOGRAPHICAL STATEMENTS

KIMBERLY ROSS CLAYSON:

- Michigan State University, B.A. International Relations, Emphasis in Economics – 2002
- University of Detroit Mercy School of Law, J.D. 2006
- Member, State Bar of Michigan 2006 – present
- Trustee, Subchapter V, Chapter 11 of the Bankruptcy Code 2020 – present
- Hearing Panelist, State of Michigan Attorney Discipline Board 2019 – present
- Crain's Detroit Business Notable Women of Law 2021, Hon. Mention 2018
- Adjunct Professor, Secured Transactions - University of Detroit Mercy School of Law, Fall 2019, Fall 2021
- Speaker, ABI Hon. Stephen W. Rhodes Consumer Bankruptcy Conference 2014-2019
- ABI Hon. Stephen W. Rhodes Consumer Bankruptcy Conference Advisory Committee 2019-2020
- CBA Hon. Stephen W. Rhodes Consumer Bankruptcy Conference Advisory Committee 2021
- Member American Bankruptcy Institute
- Member Federal Bar Association
- Member and Finance Director, Women's Law Association of Michigan – Wayne Region
- Member Consumer Bankruptcy Association
- ICLE Contributor Chapter 11 Subchapter V Training Program

## **EXHIBIT 6**

- ICLE Small Business Formation Certification 2019
- ICLE Author, Bankruptcy Causes of Action Chapter of Michigan Causes of Action, pub. 2020
- Board Member, Economic Development Corporation for the City of Detroit
- Former Board Member, Treasurer, Detroit Walldorf School
- Former Board Member, President, The Villages of Detroit Community Development Corporation

**EXHIBIT 7**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**IN RE:**

National Filters Inc.

Case No. 21-21149-dob

Debtor(s).

Hon. Daniel S. Opperman, Bay City  
Chapter 11, Subchapter V

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**ITEMIZED EXPENSES**

N/A



**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**IN RE:**

National Filters Inc.

Case No. 21-21149-dob

Debtor(s).

Hon. Daniel S. Opperman, Bay City  
Chapter 11, Subchapter V

**NOTICE OF APPLICATION FOR APPROVAL OF FEES AND COSTS OF  
CHAPTER 11 SUBCHAPTER V TRUSTEE**

Notice is hereby given that Kimberly Ross Clayson, Chapter 11 Subchapter V Trustee has made application to the Bankruptcy Court for allowance of fees and expenses as listed below:

**Fees Requested**  
\$7,128

**Expenses Requested**  
\$0

TOTAL: \$7,128

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

PLEASE NOTE: The application is available for public scrutiny at the United States Bankruptcy Court Clerk's Office, 211 W. Fort Street, Detroit, MI 48226, Monday through Friday, from 9:00 a.m. until 4:00 p.m. No hearing will be set before the Court unless a written objection to this application is timely filed with the Clerk of the Bankruptcy Court. If you have any objection, you have twenty (21) days from the date of service of this notice in which to file such written objection. In the event an objection is filed, a subsequent notice will be sent to you of the date, time, and location of the hearing on the objection.

If you do not want the court to award these fees and costs, or if you want the court to consider your views on the fee application, within 21 days from the date of service you or your attorney must:

1. File with the court a written response or an answer, explaining your position, with the U.S. Bankruptcy Court Clerk's Office at: **211 W. Fort St., Detroit, MI 48226**. If you mail your response to the court you must mail it early enough so that the court will receive it on or before the date stated above.
2. You must also mail a copy of your response or answer to:
  - (a) Kimberly Ross Clayson, Subchapter V Trustee, 27777 Franklin Rd., Ste. 2500, Southfield, MI 48034; and
  - (b) Office of the United States Trustee, 211 West Fort Street, Suite 700, Detroit, MI 48226.
3. If a response or answer is timely filed and served, the clerk will schedule a hearing on the application, and you will be served with a notice of the date, time and location of the hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought and may enter an order granting that relief.

Respectfully submitted,

SUBCHAPTER V. TRUSTEE

Dated: June 8, 2022

By: /s/ Kimberly Ross Clayson  
Kimberly Ross Clayson (P69804)  
JAFJE, RAITT, HEUER & WEISS, P.C.  
27777 Franklin Road – Suite 2500  
Southfield, MI 48034  
P: 248.351.3000  
[kclayson@jaffelaw.com](mailto:kclayson@jaffelaw.com)

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**IN RE:**

National Filters Inc.

Case No. 21-21149-dob

Debtor(s).

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Hon. Daniel S. Opperman, Bay City  
Chapter 11, Subchapter V

**CERTIFICATE OF SERVICE**

Re: Application for Order Approving Fees and Expenses for Chapter 11, Subchapter V Trustee; Proposed Order; List of Exhibits; Exhibits; Notice; Certificate of Service.

I hereby certify that on June 8, 2022, I electronically filed the foregoing papers with the Clerk of the Court using the ECF system, which will send notification of such filing to the Office of the United States Trustee and all those listed by the Court as receiving electronic notices in this case from the Court's CM/ECF system.

Respectfully submitted,

SUBCHAPTER V. TRUSTEE

Dated: June 8, 2022

By: /s/ Kimberly Ross Clayson  
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